

FILED

April 6, 2022

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: DT
Deputy

UNITED STATES OF AMERICA,**Plaintiff,****v.****MATTHEW JOSEPH CONTRERAS,****Defendant.****EP-22-CR-00443-DCG****INDICTMENT****CT 1:** 18 U.S.C. §1201(a)(1) –

Kidnapping; and

CT 2: 18 U.S.C. §§ 922(g)(9) & 924(a)(2) –
Possession of a Firearm by a Prohibited
Person (Misdemeanor Crime of Domestic
Violence)

*Notice of Government's Demand for
Forfeiture*

THE GRAND JURY CHARGES:

COUNT ONE

(18 U.S.C. § 1201(a)(1))

Kidnapping

On or about March 14, 2022, within the Western District of Texas, District of New Mexico,
and elsewhere, the Defendant,

MATTHEW JOSEPH CONTRERAS,

did unlawfully and willfully seize, confine, abduct, and carry away and hold for ransom, reward,
and otherwise, and in committing and in furtherance of the commission of the offense, did
willfully transport J.S. in interstate commerce from El Paso, Texas to Alamogordo, New
Mexico, in violation of Title 18, United States Code, Section 1201(a)(1).

COUNT TWO

(18 U.S.C. §§922(g)(9) and 924(a)(2))

Possession of a Firearm by Prohibited Person

On or about March 14, 2022, within the Western District of Texas, District of New Mexico,
and elsewhere, the Defendant,

MATTHEW JOSEPH CONTRERAS,

did knowingly possess a firearm and ammunition that had been shipped and transported in interstate commerce, that is, a black Taurus G2C 9mm, bearing serial number ACG082297 and approximately ten, 9mm rounds of ammunition. The Defendant had been convicted of a misdemeanor crime of domestic violence, to wit: Assault Family Violence, Texas Penal Code 22.01, El Paso Criminal Court 7, Cause No. 2016OCO1988. At the time he possessed the firearm, the Defendant knew he had been convicted of said misdemeanor, in violation of Title 18, United States Code, Sections 922(g)(9) and 924(a)(2).

NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE

[See Fed. R. Crim. P. 32.2]

I.

Firearms Violations and Forfeiture Statutes

[Title 18 U.S.C. §§ 922(g)(9) and 924(a)(2), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]

As a result of the foregoing criminal violations set forth in Count Two, the United States gives notice to Defendant **MATTHEW JOSEPH CONTRERAS**, of its intent to seek the forfeiture of certain properties upon conviction pursuant to Fed R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c). Section 924 states, in pertinent part, the following:

Title 18 U.S.C. § 924.

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of . . . section 922 . . . or knowing violation of section 924 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter . . .

The Notice of Demand of Forfeiture includes but is not limited to the properties described below in Paragraph II.

II.

Properties

1. Black Taurus G2C, 9mm, bearing serial number ACG082297;
2. 10, 9 mm rounds of ammunition;
3. 1 9mm Luger round found in the waste basket in the kitchen;
4. 1 9 mm Luger round found in the first floor bedroom, in a nightstand;
5. 1 9 mm Luger round found on the floor next to the first floor bedroom nightstand;
6. 1 Winchester 12 gauge shotgun shell in the first floor bedroom; and
7. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offense.



ASHLEY C. HOFF
UNITED STATES ATTORNEY

BY: _____

Assistant U. S. Attorney